

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JING LIU,

Plaintiff,

-against-

SCHULTE ROTH & ZABEL LLP

Defendant

Case No. 23-CV-10781 (MMG)

**STIPULATION AND ORDER**  
**SUBSTITUTING ATTORNEYS**  
**AND APPLICATION FOR**  
**CHARGING LIEN**

Pursuant to SDNY Local Rule 1.4, the undersigned hereby stipulate and consent to the substitution of The Warshawsky Law Firm, by and through its attorney, Steven M. Warshawsky, Esq., as the attorney of record for Plaintiff Jing Liu in the above captioned matter in place and instead of Pacific Justice Institute (“PJI”), and its attorney Ms. Mishael M. Pine, Esq.;

WHEREAS, on October 17, 2023, Ms. Liu retained Pacific Justice Institute to represent her and signed a written agreement (“retainer agreement”) memorializing the representation; and

WHEREAS, on December 12, 2023, PJI initiated an action on Ms. Liu’s behalf against Schulte Roth & Zabel LLP in the United States District Court for the Southern District of New York captioned Jing Liu v. Schulte Roth & Zabel LLP, Case No. 23-cv-10781 (MMG); and

WHEREAS, on February 7, 2025, in a formal court conference before the Hon. Margaret Garnett, which included PJI through Ms. Mishael M. Pine, Esq., Ms. Liu’s new attorney Mr. Steven Warshawsky, Esq., of the Warshawsky Law Firm and Mr. Cameron Smith, Esq. and Mr. Max Scharf, Esq. of Seyfarth Shaw LLP, counsel for the defendant, PJI agreed to withdraw

counsel for Ms. Liu, and PJI asserts a charging lien for services rendered and expenses accrued as counsel for Ms. Liu from October 17, 2023 to January 27, 2025; and

WHEREAS, Mr. Warshawsky and Ms. Pine, having conferred with each other regarding this stipulation and charging lien, and obtaining consent from Ms. Liu;

NOW, THEREFORE, Pursuant to New York Judiciary Law § 475 and section six of the retainer agreement between Ms. Liu and PJI, signed by Ms. Liu on October 17, 2023, PJI will maintain a charging lien in this matter to recover attorney fees and expenses accrued from the point of representation on October 17, 2023 to PJI's formal discharge by Ms. Liu on January 27, 2025.

Dated: February 14<sup>th</sup> 2025

PACIFIC JUSTICE INSTITUTE

By:   
Michael M. Pine  
Staff Attorney

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Dated: Feb. 14, 2025

THE WARSHAWSKY LAW FIRM

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**The substitution of attorney and charging lien hereby approved and SO ORDERED.**

Dated: \_\_\_\_\_, 2025

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HON. MARGARET M. GARNETT  
UNITED STATES DISTRICT JUDGE